

December 13, 2002

RE: Rinker Boat Company 085-16673-00031

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision - Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures

December 13, 2002

Mr. John Peat
Rinker Boat Company, Inc.
300 West Chicago Street
Syracuse, Indiana 46567

Re: 085-16673
Third Administrative Amendment to
Part 70 085-7516-00031

Dear Mr. Peat:

Rinker Boat Company, Inc. was issued a permit on June 3, 1999 for a stationary fiberglass boat building and repairing operation. A letter requesting an Administrative Amendment to:

- (a) install two (2) new CNC routers and remove one (1) existing panel saw and one (1) existing router at their existing Plant #1 woodworking operation; and
- (b) install one (1) new baghouse at their existing Plant #2 Trim-off area;

was received on October 17, 2002. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. Condition A.2:

The unit description of Condition A.2 shall be amended as follows to include the modifications to the woodworking operation:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

.....

- (9) one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of ~~two~~ **three (23)** routers, three (3) table saws, three (3) chop saws, ~~one (1) panel saw~~, and one (1) belt sander, processing a maximum of ~~890~~ **1100** pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

2. Condition A.3:

Condition A.3 shall be amended as follows to include the units description for the Plant #2 trim-off area.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Other categories with emissions below significant thresholds:

- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]
- (b) **one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2 Baghouse) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]**

3. Unit Description of Section D.2:

The unit description of Section D.2 shall be modified as follows to include the new woodworking operation description.

SECTION D.2 FACILITY OPERATION CONDITIONS

one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of ~~two three~~ **(23)** routers, three (3) table saws, three (3) chop saws, ~~one (1) panel saw~~, and one (1) belt sander, processing a maximum of ~~890~~ **1100** pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

4. Condition D.2.1:

Condition D.2.1 shall be modified as follows to include the new 326 IAC 6-3-2 limit established based on the new woodworking operation process weight rate of 1100 lb/hr.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking operation shall not exceed ~~2.475~~ pounds per hour when operating at a process weight rate of 890 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

5. Unit Description of Section D.3:

The unit description of Section D.3 shall be modified as follows to include the units description for the Plant #2 trim-off area.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) Other categories with emissions below significant thresholds:
 - (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building.
 - (b) **one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2) for control of PM and PM10 emissions, exhausting inside the building.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

6. Condition D.3.1:

Condition D.3.1 shall be modified as follows to specify that the limit applies to the Plant #3 trim-off area.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the **Plant #3** Trim-off operation shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

7. Condition D.3.2:

A new Condition D.3.2 shall be added to include the 326 IAC 6-3-2 requirements associated with the Plant #2 trim-off area.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Trim-off operation of Plant #2 shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

8. Table of Contents:

The Table of Contents shall be amended as follows to include the new Condition D.3.1.

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Trim-off operations

.....
D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]
D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]
.....

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton at (317) 233-5691 or dial (800) 451-6027, press 0 and ask for extension 3-5691.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
SDF

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Rinker Boat Company, Inc.
300 West Chicago Street
Syracuse, Indiana 46567**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T085-7516-00031	Date Issued: June 3, 1999
1 st Administrative Amendment 085-11115-00031	Date Issued: December 6, 1999
1 st Significant Source Modification No.: 085-13683-00031	Date Issued: May 15, 2001
2 nd Administrative Amendment 085-14019-00031	Date Issued: May 17, 2001
3 rd Administrative Amendment 085-16673-00031	Affected Pages: 4, 6, 32, 33, and 33a, with 33b added
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Date Issued: December 13, 2002

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

D.2.3 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Trim-off operation

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Certification Form

Emergency/Deviation Occurrence Report

Quarterly Report Forms

Quarterly Compliance Monitoring Report

- (8) one (1) foam blowing operation (ID No. P2-2), constructed in 1993, located in Plant 2, using a maximum of 13.2 pounds of flotation foam per hour, and exhausting through four (4) stacks (ID Nos. S2-1, S2-2, S2-3, and S2-4); and
- (9) one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of three (3) routers, three (3) table saws, three (3) chop saws, and one (1) belt sander, processing a maximum of 1100 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Other categories with emissions below significant thresholds:
 - (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]
 - (b) one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2 Baghouse) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of three (3) routers, three (3) table saws, three (3) chop saws, and one (1) belt sander, processing a maximum of 1100 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking operation shall not exceed 2.75 pounds per hour when operating at a process weight rate of 890 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.3 Particulate Matter (PM)

The cyclone for PM control shall be in operation at all times when the woodworking equipment is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.4 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking operation cyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the woodworking operation cyclone stack exhaust.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) Other categories with emissions below significant thresholds:
- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building.
 - (b) one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2) for control of PM and PM10 emissions, exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Process Weight Activities

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Plant #3 Trim-off operation shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Trim-off operation of Plant #2 shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

Rinker Boat Company, Inc.
Syracuse, Indiana
Permit Reviewer: TE/EVP

Third Administrative Amendment No. 085-16673
Modified By: TE/EVP

Page 33b of 40
OP No. T085-7516-00031

where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Administrative Amendment to an Existing Part 70 Permit

Source Background and Description

Source Name:	Rinker Boat Company, Inc.
Source Location:	300 West Chicago Street, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3732
Operation Permit No.:	085-7516-00031
Operation Permit Issuance Date:	June 3, 1999
Administrative Amendment No.:	085-16673-00031
Permit Reviewer:	SDF

The Office of Air Quality (OAQ) has reviewed an application from the Rinker Boat Company, Inc. relating to a modification to their existing fiberglass boat building and repair operation.

Request

On October 17, 2002, Rinker Boat Company, Inc. submitted an application to:

- (a) install two (2) new CNC routers and remove one (1) existing panel saw and one (1) existing router at their existing Plant #1 woodworking operation; and
- (b) install one (1) new baghouse at their existing Plant #2 Trim-off area.

The proposed woodworking equipment will not generate an increase in production or emissions from any existing equipment, but will generate a slight increase in capacity and PM/PM10 emissions at the existing woodworking area.

The removal of the existing panel saw and router will not significantly impact the emissions generated by the woodworking operation.

The proposed baghouse being installed will control PM/PM10 emissions from the trim-off area of Plant #2. The purpose of installing the baghouse is simply to improve the indoor working environment. The proposed baghouse is not an emission unit, is not required to be installed, and has no applicable requirements.

Based on the above description, it is determined that the emissions due to the proposed modification are the increased PM/PM10 emissions generated by the increased capacity of the woodworking operation.

The PM/PM10 unrestricted potential to emit (UPTe) is estimated to be 1.56 tons/yr which is less than the applicable Part 70 Minor Source Modification level of 5 tons per year. Thus, the proposed modification is not a Minor Source Modification under 326 IAC 2-7-10.5(d) or a Significant Source Modification under 326 IAC 2-7-10.5(f).

Thus, since there are no new requirements that become applicable as a result of the proposed modification and the modification is not a source modification under 326 IAC 2-7-10.5, the proposed modification shall be incorporated into the existing Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states that modifications which revise descriptive information where the revision will not trigger any new applicable requirements, may be incorporated into the permit via an administrative amendment.

Existing Approvals

The source has been operating under the following approvals:

(a) Existing Part 70 Permit:	085-7516-00031	Date Issued:	June 3, 1999
(b) First Administrative Amendment No.:	085-11115-00031	Date Issued:	December 6, 1999
(c) First Significant Source Modification No:	085-13683-00031	Date Issued:	May 15, 2001
(d) Second Administrative Amendment No.:	085-14019-00031	Date Issued:	May 17, 2001.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application.

Emission Calculations

(a) Unrestricted Potential to Emit (UPTE) Due to the Modification:

The emissions generated by the proposed modification are PM and PM10 emissions generated from the increased woodworking operation production rate.

The following calculations determine the PM/PM10 UPTE based on the existing maximum production rate of 890 lb wood/hr, a new maximum production rate of 1100 lb wood/hr, a PM/PM10 emission factor of 1.872 pounds per hour as used in the Part 70 determination, 8760 hours of operation, and emissions before controls.

(1) Fraction of Production Increase:

$$[1 - (890 \text{ lb/hr} / 1100 \text{ lb/hr})] = 0.19$$

(2) Emissions Due to the Modification:

$$0.19 * 1.872 \text{ lb PM(PM10)/hr} * 8760 \text{ hr/yr} * 1/2000 \text{ ton/lb} = 1.56 \text{ tons PM(PM10)/yr}^*$$

- * The PM/PM10 emissions are determined based on emissions after controls because during the original review of the Part 70 permit, it was determined that the cyclone is part of the woodworking process and the PM/PM10 UPTE is the PM/PM10 emissions after controls based on 8760 hours of operation.

(b) Emissions After Controls:

The PM/PM10 emissions after controls are equal to the PM/PM10 UPTE.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls due to the modification based on the above estimated emissions calculations. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	1.56
PM-10	1.56
SO ₂	-
VOC	-
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Since there are no new requirements that become applicable as a result of the proposed modification and the modification is not a source modification under 326 IAC 2-7-10.5, the proposed modification shall be incorporated into the existing Part 70 permit via an Administrative Amendment pursuant to 326 IAC 2-7-11(a)(8) which states that modifications which revise descriptive information where the revision will not trigger any new applicable requirements, may be incorporated into the permit via an administrative amendment.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM ₁₀	attainment or unclassifiable
SO ₂	attainment or unclassifiable
NO ₂	attainment or unclassifiable
Ozone	attainment or unclassifiable
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, the VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration, 326 IAC 2-2 and 40 CFR 52.21.
- (b) Kosciusko County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source*	<100	<100	<100	<100	>100, <250	<100	>10	>25
PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

* The existing source emissions are the emissions obtained from the most recent Technical Support Document (085-13683-00031, issued on October 17, 2002)

- (a) This existing source is not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more and it is not one of the 28 listed source categories.
- (b) This existing source is a Title V major stationary source because the VOC emissions exceed the applicable level of 100 tons per year, and the single and combined HAP emissions exceed the respective applicable levels of 10 and 25 tons per year.

Emissions Due to the Modification

Emissions Due to the Proposed Modification (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Modification	1.56	1.56	-	-	-	-	-	-
PSD Major Levels	250	250	250	250	250	250	-	-

The proposed modification is not a major PSD modification because no applicable emissions exceed the respective applicable major source levels.

Source Status After the Modification

Source Emissions After the Modification (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Single HAP (tons/yr)	Comb. HAPs (tons/yr)
Source*	<100	<100	<100	<100	>100, <250	<100	>10	>25

PSD Major Levels	250	250	250	250	250	250	-	-
Part 70 Major Levels	-	100	100	100	100	100	10	25

- (a) The source after the proposed modification is still not a major PSD stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more.
- (b) The source after the modification is still a Title V major stationary source because the VOC emissions exceed the applicable level of 100 tons per year, and the single and combined HAP emissions exceed the respective applicable levels of 10 and 25 tons per year.

Federal Rule Applicability

(a) New Source Performance Standards (NSPS):

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAPs):

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Parts 61 and 63) applicable to this modification.

State Rule Applicability

(a) Entire State Rule Applicability:

(1) 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source is still required to have a preventive maintenance plan for the emission units and control devices of the source.

(2) 326 IAC 2-2 (Prevention of Significant Deterioration)

The proposed modification is not subject to 326 IAC 2-2 (PSD) because the modification emissions do not exceed the applicable major source levels.

(3) 326 IAC 2-6 (Emission Reporting)

The source is still subject to 326 IAC 2-6 because it has the potential to emit more than one hundred (100) tons per year of VOC and PM10.

(4) 326 IAC 5-1 (Visible Emissions Limitations)

The source is still subject to the requirements of 326 IAC 5-1.

(5) 326 IAC 6-4 (Fugitive Dust Emissions)

This source is still subject to the fugitive dust requirements of 326 IAC 6-4.

(b) Individual State Rule Applicability

(1) 326 IAC 6-3-2 (Process Operations), Woodworking Operation

The woodworking operation is still subject to the requirements of 326 IAC 6-3. However, since the process weight rate has changed from 890 to 1100 pounds per hour, the limit needs to be adjusted accordingly.

The particulate matter (PM) emissions from the woodworking operation (ID No. P1-2) shall, for a process weight rate of 0.55 tons/hr, be limited to 2.75 pounds per hour.

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour
= 0.55 tons per hour

$$E = 4.10 (0.55)^{0.67}$$

E = 2.75 pounds per hour

Potential controlled emissions from the woodworking operation (ID No. P1-2) are 8.2 tons per year plus the increased emissions of 1.56 tons per year, or 9.76 tons/yr. The hourly equivalent, 2.23 lb/hr, is less than the limit of 2.75 lb/hr.

Therefore, compliance with 326 IAC 6-3-2 is determined to be achieved.

(2) 326 IAC 6-3-2 (Process Operations), Plant #2 Trim-off Operation

The trim-off operation is subject to the requirements of 326 IAC 6-3. However, while the applicant submitted the appropriate information regarding the Plant #2 trim-off area, the reviewer did not include the trim-off area emissions in the source PTE determination and no 326 IAC 6-3 limit was established.

Therefore, the following limit shall be established for the Plant #2 trim-off area.

The particulate matter (PM) emissions from the plant #2 trim-off area shall, for a process weight rate of 2575 lb/hr (1.29 tons/hr), be limited to 4.86 pounds per hour.

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour
= 1.29 tons per hour

$$E = 4.10 (1.29)^{0.67}$$

E = 4.86 pounds per hour

The trim-off area PM emissions are estimated to be 3.36 lb/hr which is less than the 326 IAC 6-3-2 limit of 4.86 lb/hr.

Therefore, compliance is determined to be achieved.

Changes to the Permit:

The following is a description of all of the changes that are necessary to incorporate the proposed modification into the existing Part 70 Permit. Added language is indicated in bold type. Deleted information is struck out.

1. Condition A.2:

The unit description of Condition A.2 shall be amended as follows to include the modifications to the woodworking operation:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

.....

- (9) one (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of ~~two~~ **three (23)** routers, three (3) table saws, three (3) chop saws, ~~one (1) panel saw~~, and one (1) belt sander, processing a maximum of ~~890~~ **1100** pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

2. Condition A.3:

Condition A.3 shall be modified as follows to include the units description for the Plant #2 trim-off area.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Other categories with emissions below significant thresholds:

- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]

- (b) one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2 Baghouse) for control of PM and PM10 emissions, exhausting inside the building. [326 IAC 6-3-2]**

3. Unit Description of Section D.2:

The unit description of Section D.2 shall be modified as follows to include the new woodworking operation description.

SECTION D.2 FACILITY OPERATION CONDITIONS

One (1) woodworking operation (ID No. P1-2), constructed in 1993, located in Plant 1, consisting of ~~two three~~ (23) routers, three (3) table saws, three (3) chop saws, ~~one (1) panel saw~~, and one (1) belt sander, processing a maximum of ~~890~~ 1100 pounds of plywood per hour, with a cyclone for particulate matter control, and exhausting through one (1) stack (ID No. S1-2).

4. Condition D.2.1:

Condition D.2.1 shall be modified as follows to include the new 326 IAC 6-3-2 limit established based on the new woodworking operation process weight rate of 1100 lb/hr.

D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking operation shall not exceed 2.475 pounds per hour when operating at a process weight rate of 890 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

5. Unit Description of Section D.3:

The unit description of Section D.3 shall be modified as follows to include the units description for the Plant #2 trim-off area.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(1) Other categories with emissions below significant thresholds:

- (a) one (1) Trim-off operation consisting of hand-held grinders in Plant 3 and the Plant 3 expansion for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with two (2) baghouses (ID Nos. BH-1 and BH-2) for control of PM and PM10 emissions, exhausting inside the building.
- (b) **one (1) Trim-off operation consisting of hand-held grinders in Plant 2 for trimming/grinding boats after removed from molds with a maximum process weight rate of 2,575 pounds per hour, with potential PM and PM10 emissions less than five (5) pounds per hour, with one (1) baghouse (ID Plant #2) for control of PM and PM10 emissions, exhausting inside the building.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

6. Condition D.3.1:

Condition D.3.1 shall be modified as follows to specify that the limit applies to the Plant #3 trim-off area.

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the **Plant #3** Trim-off operation shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

7. Condition D.3.2:

A new Condition D.3.2 shall be added to include the 326 IAC 6-3-2 requirements associated with the Plant #2 trim-off area.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the Trim-off operation of Plant #2 shall not exceed 4.86 pounds per hour when operating at a process weight rate of 2,575 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

**where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour**

8. Table of Contents:

The Table of Contents shall be amended as follows to include the new Condition D.3.1.

D.3 FACILITY OPERATION CONDITIONS - Insignificant Activities - Trim-off operations

.....

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

.....

Conclusion

The owner or operator shall construct and operate the proposed equipment of this modification according to the requirements of the existing source approvals and the attached proposed **Administrative Amendment 085-16673-00031.**